

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

THE ESTATE OF DEMETRIUS L. STEPHENSON,

Plaintiff,

v.

CALUMET COUNTY, ET AL.,

Case No: 1:22-cv-00956-WCG

Defendants.

PLAINTIFF'S PROPOSED SPECIAL VERDICT FORM

Plaintiff, The Estate of Demetrius L. Stephenson, pursuant to Civ. L. R. 16(c) and the Court's Pretrial Order (ECF 261), submits the following proposed special verdict form:

We, the jury, for our special verdict, do find as follows:

Question 1. Did Shannon Teska violate Demetrius Stephenson's Fourteenth Amendment rights?

Answer: Yes _____ No _____

Question 2. Did Kristin Klotz violate Demetrius Stephenson's Fourteenth Amendment rights?

Answer: Yes _____ No _____

Question 3. Did Kristi LeClair violate Demetrius Stephenson's Fourteenth Amendment rights, either by her direct actions or by personally directing, condoning, or approving of the conduct or actions of Shannon Teska and/or Kristin Klotz?

Answer: Yes _____ No _____

Question 4. Did Calumet County violate Demetrius Stephenson's Fourteenth Amendment rights by virtue of any of the below:

a. a decision or policy statement made by Kristi LeClair;

- b. a policy-gap, or custom or practice that prevented inmates at the Calumet County Jail from receiving a psychiatric assessment, a developed treatment plan, and/or the prescription of psychotropic medication;
- c. a custom or practice of ignoring written policies;
- d. a custom or practice of failing to train staff?

Answer: Yes _____ No _____

If you answered "Yes" to any of the above Questions 1-4, then answer Question 5 below. If you answered "No" to all of the above questions, then do not answer any further questions.

Question 5. What amount of money would fairly and adequately compensate the Estate of Demetrius Stephenson for the physical and mental suffering prior to his death that was caused by the above individuals or entities for whom you answered "yes" to questions 1-4?

Answer: \$ _____

If you answered "Yes" to Question 1 above, then answer Question 6 below.

Question 6. Was Shannon Teska's violation of Demetrius Stephenson's Fourteenth Amendment rights a cause of Demetrius Stephenson's death?

Answer: Yes _____ No _____

If you answered "Yes" to Question 2 above, then answer Question 7 below.

Question 7. Was Kristin Klotz's violation of Demetrius Stephenson's Fourteenth Amendment rights a cause of Demetrius Stephenson's death?

Answer: Yes _____ No _____

If you answered "Yes" to Question 3 above, then answer Question 8 below.

Question 8. Was Kristi LeClair's violation of Demetrius Stephenson's Fourteenth Amendment rights a cause of Demetrius Stephenson's death?

Answer: Yes _____ No _____

If you answered "Yes" to Question 4 above, then answer Question 9 below.

Question 9. Was Calumet County's violation of Demetrius Stephenson's Fourteenth Amendment rights a cause of Demetrius Stephenson's death?

Answer: Yes _____ No _____

If you answered "Yes" to any of the above Questions 6-9, then answer Question 10 below.

Question 10. What amount of money would fairly and adequately compensate the Estate for Demetrius Stephenson's loss of life and the enjoyment thereof?

Answer: \$ _____

If you answered "Yes" to Question 1 above, then answer Question 11 below.

Question 11. Was Shannon Teska's conduct either malicious or in reckless disregard of Demetrius Stephenson's rights?

Answer: Yes _____ No _____

If you answered "Yes" to Question 10 above, then answer Question 12 below.

Question 12. What amount, if any, do you award as punitive damages against Shannon Teska?

Answer: \$ _____

If you answered "Yes" to Question 2 above, then answer Question 13 below.

Question 13. Was Kristin Klotz's conduct either malicious or in reckless disregard of Demetrius Stephenson's rights?

Answer: Yes _____ No _____

If you answered "Yes" to Question 13 above, then answer Question 14 below.

Question 14. What amount, if any, do you award as punitive damages against Kristin Klotz?

Answer: \$ _____

If you answered "Yes" to Question 3 above, then answer Question 15 below.

Question 15. Was Kristi LeClair's conduct either malicious or in reckless disregard of Demetrius Stephenson's rights?

Answer: Yes _____ No _____

If you answered "Yes" to Question 15 above, then answer Question 16 below.

Question 16. What amount, if any, do you award as punitive damages against Kristi LeClair?

Answer: \$ _____

Presiding Juror

Date: _____

Green Bay, Wisconsin

Respectfully submitted,

Dated: 18 July 2025,

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